



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 22, 2017

BY ECF & E-MAIL

Honorable Richard J. Sullivan
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

**Re: United States v. Parrello, et al.,
S1 16 Cr. 522 (RJS)**

Dear Judge Sullivan:

The Government writes to respectfully inform the Court that on March 20, 2017, a Grand Jury sitting in this District returned a superceding indictment (the "S1 Indictment") in the above-captioned case. The S1 Indictment includes the following new information:

1. Kidnapping, in violation of New York Penal Law Sections 135.25, 135.20, 105.10, and 110.00, was added as a pattern of racketeering activity through which the defendants and their co-conspirators agreed to conduct and participate in the conduct of the affairs of the charged enterprise to Count One, which charges racketeering conspiracy in violation of Title 18, United States Code, Section 1962(d).
2. Count Five charges defendant Anthony Camisa, a/k/a "Anthony the Kid," with kidnapping in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a)(1).
3. Count Six charges Camisa with using, possessing, carrying and brandishing firearms in connection with the racketeering conspiracy charged in Count One of the S1 Indictment and the kidnapping in aid of racketeering charged in Count Five of the S1 Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii) and 2.

